

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

AGUSTINA BUENO,

Plaintiff,

-against-

MEL S. HARRIS AND ASSOCIATES, LLC

LR CREDIT 18, LLC

MEL S. HARRIS

DAVID WALDMAN

KERRY H. LUTZ

TODD FABACHER

MICHAEL YOUNG

SAMSERV, INC

HUSAM AL-ATRASH

WILLIAM MLOTOK

Defendants.

Case No. 16-cv-04737 (WFK) (VMS)

**STIPULATION**

Plaintiff Agustina Bueno and Defendants LR Credit 18, Samserv, Inc., and William Mlotok (together, the "Parties") hereby stipulate and agree as follows:

1. The Parties shall serve their cross-motions for summary judgment on or before August 31, 2018;
2. The Parties shall serve their response papers on or before October 19, 2018;
3. The Parties shall serve their reply papers on or before November 16, 2018; and
4. All cross-motions for summary judgment, response papers, and reply papers shall be served and filed in compliance with Rule III.G of the Individual Motion Practices and Rules of Judge William F. Kuntz, II.

SO ORDERED:

\_\_\_\_\_  
HON. WILLIAM F. KUNTZ, II  
UNITED STATES DISTRICT JUDGE

Dated: \_\_\_\_\_

**AGREED:**

**Defendant LR CREDIT 18, LLC**

By: /s/ Scott Balber  
Scott Balber  
Herbert Smith Freehills NY LLP

Dated: February 14, 2018

**Defendant SAMSERV, INC**

By: /s/ Jeffrey Lichtman  
Jeffrey Lichtman  
O'Hare Parnagian LLP

Dated: February 14, 2018

**Plaintiff AGUSTINA BUENO**

By: /s/ Ahmad Keshavarz  
Ahmad Keshavarz  
The Law Office of Ahmad Keshavarz

Dated: February 14, 2018